

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JOHN DOE 162, et al.,

Plaintiffs,

v.

THE OHIO STATE UNIVERSITY,

Defendant.

Case No. 2:23-cv-02991

Judge Michael H. Watson

Magistrate Judge Elizabeth P. Deavers

**UNOPPOSED MOTION FOR PERMISSION TO FILE UNDER SEAL**

Plaintiffs in the above-captioned case are the remaining Plaintiffs represented by the undersigned law firm in the cases known as *John Doe 151, et al. v. The Ohio State University*, 2:20-cv-3817, *John Doe 174, et al. v. The Ohio State University*, 2:21-cv-2121, and *John Doe 192, et al. v. The Ohio State University*, 2:21-cv-2527 that were consolidated into a single Complaint and re-filed under the case caption above (the “Plaintiffs”), pursuant to prior Order of this Court, ECF No. 36 in Case: 2:21-cv-02527-MHW-EPD. Plaintiffs now respond to this Court’s order in the remaining cases involving Title IX claims against Defendant the Ohio State University, as follows:

**Plaintiffs in the remaining cases are DIRECTED to seek leave to file under seal a Complaint bearing any Doe Plaintiffs true names WITHIN 7 days. To the extent any Doe Plaintiffs in the remaining cases previously have not moved to proceed anonymously, any forthcoming filing must address that issue as well.** (the “October 10, 2023 Order”)

Plaintiffs first note this Court previously granted them permission to proceed anonymously in their respective originally filed lawsuits against Defendant The Ohio State University. For the same reasons set forth in those motions, Plaintiffs again seek leave to file their lawsuit under seal.

To wit, Plaintiffs John Doe 162, 174, 176, 182, 183, 195, and Jane Doe 1 request they be excused from identifying themselves here given their “privacy interest,” *Doe v. Porter*, 370 F.3d 558, 560 (6th Cir. 2004), in issues of “assault and battery,” which courts have held is “of the utmost intimacy,” *see A.M.S. v. Steele*, 2011 U.S. Dist. LEXIS 52948, \*3 (S.D. Ohio 2011).

Consistent with the Court’s earlier orders in the *John Doe 151, et al.* case, see Order, *John Doe 151, et al.*, 2:20-cv-3817, (S.D. Ohio Nov. Aug. 7, 2020), ECF No. 11, *John Doe 174, et al.* case, see Order, *John Doe 174, et al.*, 2:21-cv-2121, (S.D. Ohio Sept. 10, 2021), ECF No. 13, and *John Doe 192, et al.* case, see Order, *John Doe 192, et al.*, 2:21-cv-2527, (S.D. Ohio Sept. 10, 2021), ECF No. 19. Plaintiffs further request that the Court (i) require the John and Jane Doe Plaintiffs’ true names be disclosed only to Defendant, Defendant’s attorneys, those working for them, and witnesses on a “need to know” basis and only during the course of this lawsuit; and (ii) prohibit the parties or their representatives from disclosing in pleadings or other documents filed with the Court the John Doe Plaintiffs’ names or identities.

Finally, consistent with the October 10, 2023 Order, Plaintiffs seek leave to file under seal a version of the Consolidated Complaint filed on September 18, 2023, ECF No. 1, that reveals the true name of the John Doe and Jane Doe Plaintiffs.

Defendant does not oppose this request.

Respectfully submitted,

/s/ Richard W. Schulte  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 16th day of October 2023, the foregoing was filed via the ECF/CM system with the Clerk of the Court and served upon counsel of record via email through the Court's ECF/CM system by means of the Notice of Electronic Filing, pursuant to Fed. R. Civ. P. 5(b)(2)(E).

/s/ Richard W. Schulte  
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